

Cameron Hall; AZ Bar No. 025177
Michael Zoldan; AZ Bar No. 028128
Zachary Price; AZ Bar No. 028464
HALL & CHELLE LAW, LLC
7400 E. Pinnacle Peak Rd. # 204
Scottsdale, AZ 85255
Tel & Fax: 480.422.4529
Cameron@Hall-Chelle.com
Michael@Hall-Chelle.com
ZPrice@Hall-Chelle.com
Docketing@Hall-Chelle.com

Attorneys for Plaintiff
Tracy Rexroat

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Tracy Rexroat,

Plaintiff,

v.

**Arizona Department of Education;
and, State of Arizona, State Board of
Education,**

Defendant.

Case No: 2:11-cv-01028-PHX-PGR

**EX PARTE MOTION TO WITHDRAW
AS COUNSEL**

**(Assigned to the
Hon. Paul G. Rosenblatt)**

Pursuant to LRCiv 83.3(b), Federal Rule of Civil Procedure and Ethical Rules 1.4 and 1.16, attorney Michael Zoldan and Hall & Chelle Law, LLC hereby move to this Court to withdraw as counsel for Plaintiff Tracy Rexroat (“**Rexroat**”).

Rexroat’s consent to this withdrawal is provided below. Rexroat has been notified in writing of the status of this case, including the dates and times of any court hearings or trial settings, pending compliance with any existing court orders, and the possibility of

1 sanctions.

2 The last known address and telephone number for Rexroat is as follows:

3 Tracy Rexroat
4 3308 N. 39th Ave.
5 Phoenix, AZ 85019
6 (602) 716-1172

7 Rexroat has been informed that she is responsible for the ongoing conduct of these
8 proceedings and must abide by all Rules and existing Court Orders at penalty of sanction.
9 Because trial for this matter will not commence for almost three months, Rexroat will
10 have adequate time to secure alternate counsel, and will not be prejudiced by counsel's
11 withdrawal.
12

13 THEREFORE, counsel respectfully requests that this Court issue the proposed
14 Order filed concurrently herewith.
15

16 DATED May 4, 2012.
17

18 **HALL & CHELLE LAW, LLC**

19
20 By: /s/ Michael Zoldan
21 7400 E. Pinnacle Peak Rd., Suite 204
22 Scottsdale, Arizona 85255
23 Attorneys for Plaintiff
24 Tracy Rexroat
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2012, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Rachel Bacalzo, Esq.
Assistant Attorney General
1275 West Washington
Phoenix, Arizona 85007
Telephone: (602) 542-7750
Rachel.Bacalzo@azag.gov

Copy of the foregoing sent via mail
And email this May 4, 2012 to:

Tracy Rexroat
3308 N. 39th Ave.
Phoenix, AZ 85019

/s/ Morgan Sullivan

HALL & CHELLE LAW, LLC

7400 E. Pinnacle Peak Rd., Suite 204, Scottsdale, AZ 85255
Tel & Fax: 480.422.4529 - Docketing@Hall-Chelle.com